



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street San Francisco, CA 94105

Mr. Bob Bealkowski
Senior Technical Manager
Environmental Strategies Consulting LLC
2025 Gateway Place, Suite 280
San Jose, CA 95110

APR 24 2006

Re: Application for a 40 CFR § 761.61(a) Approval for 18020 South Santa Fe Avenue site in Rancho Dominguez, California

Dear Mr. Bealkowski:

EPA is unable to approve your application dated March 24, 2006 for a 40 CFR § 761.61(a) self-implementing cleanup of the site located at 18020 South Santa Fe Avenue in Rancho Dominguez, California. We require additional information regarding the following topics before EPA can determine whether to approve or deny the application:

- 1) Site characterization: 40 CFR § 761.61(a)(2) identifies Subpart N as an appropriate method for site characterization. The characterization method proposed in the application is not consistent with Subpart N. Please either incorporate Subpart N into the site characterization portion of the application or explain how the alternative method will provide comparable characterization data. Note that wipe sampling is a PCB characterization option for concrete only when conducted within 72 hours of a PCB spill.
- 2) Cleanup levels: The cleanup levels in the plan are not consistent. You propose to clean up PCBs to 1 ppm in the railroad spur and former chemical storage area. You propose to leave levels of 51 ppm and 3 ppm in the former transformer pit and sump adjacent to the transformer pit. The risk-based approach proposed for the latter two sites is not an option available under 40 CFR § 761.61(a).
- 3) Cleanup verification: The application does not propose to follow the Subpart O cleanup verification approach required under 40 CFR § 761.61(a)(6). Please incorporate Subpart O in the cleanup verification portion of the application.

If you have any questions about how to modify your application to address these deficiencies, please contact Max Weintraub at 415-947-4163.

Sincerely,

Paula Bisson

Paula Bisson
Manager
Toxics Office